

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

PATSY B. CRYE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. _____
	)	
ROHM & HAAS CHEMICAL, LLC	)	
and DOW CHEMICAL COMPANY,	)	
	)	
Defendants.	)	

NOTICE OF REMOVAL

Defendants, The Dow Chemical Company ("Dow") (misidentified in the Complaint as "Dow Chemical Company") and Rohm & Haas Chemicals, LLC ("Rohm & Haas") (misidentified in the Complaint as "Rohm & Haas Chemical, LLC"), hereby give notice pursuant to 28 U.S.C. §§ 1441 and 1446 of removal to this Court of the action commenced against them in the Circuit Court for Knox County, Tennessee, styled *Patsy B. Crye v. Rohm & Haas Chemical, LLC and Dow Chemical Company*, Civil Action No. 2-393-12. The following facts support this removal:

1. On or about July 25, 2012, Plaintiff, Patsy B. Crye ("Plaintiff") filed a Complaint against Dow and Rohm & Haas in the Circuit Court for Knox County, Tennessee.

2. On or about August 16, 2012, Plaintiff's Complaint and Summons were served on the registered agent for Dow and Rohm & Haas.

3. Plaintiff is a resident of the State of Tennessee. Dow is a Delaware corporation with its principal place of business located at 2030 Dow Center, Midland, Michigan 48674. Rohm & Haas is a Delaware corporation with its principal place of business located at 100 Independent Hall West, Philadelphia, Pennsylvania 19106. In addition to complete diversity, the amount in controversy in this action exceeds \$75,000.00, exclusive of interest and costs. (Complaint at p. 1.) Thus, this Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332.

4. The United States District Court for the Eastern District of Tennessee at Knoxville is the United States District Court embracing the place where Plaintiff's state court action is pending. Therefore, Plaintiff's state court action may be removed to this Court pursuant to 28 U.S.C. § 1441.

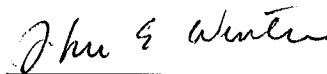
5. Rohm & Haas is a wholly owned subsidiary of Dow.

6. Pursuant to 28 U.S.C. § 1446(b), this Notice is being filed within 30 days after receipt by Defendants of a copy of Plaintiff's initial pleading.

7. After this filing, Defendants also will file a Notice of Filing of Notice of Removal in the Circuit Court for Knox County, Tennessee (attached as Exhibit A).

8. Undersigned counsel certifies that the Complaint, and Summons (attached as Exhibit B), and Notice of Filing Notice of Removal (Exhibit A) constitute all process, non-discovery related pleadings and orders served on or filed by Dow and Rohm & Haas in the state court action in this matter.

WHEREFORE, Dow and Rohm & Haas respectfully request that this Court assume jurisdiction over this action as provided by law and that it make further orders as may be required for its determination.



---

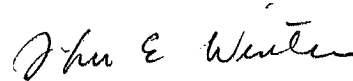
John E. Winters, BPR #016345  
Betsy J. Beck, BPR #022863  
KRAMER RAYSON LLP  
P. O. Box 629  
Knoxville, TN 37901-0629  
(865) 525-5134  
[jwinters@kramer-rayson.com](mailto:jwinters@kramer-rayson.com)

**Attorneys for Defendants  
The Dow Chemical Company and  
Rohm & Haas Chemicals, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 14<sup>th</sup> day of September, 2012, I have served a true and correct copy of the **Notice of Removal** upon counsel for Plaintiff by U.S. Mail, with adequate postage thereon, addressed as follows:

J. Steven Collins  
Burroughs Collins & Newcomb, PLC  
P.O. Box 551  
Knoxville, TN 37901-0551  
(865) 342-1040



---

John E. Winters